# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CITY OF WESTLAND POLICE AND FIRE : RETIREMENT SYSTEM, Individually and on : Behalf of All Others Similarly Situated, :

Plaintiff,

VS.

METLIFE INC., et al.,

Defendants.

Civil Action No. 1:12-cv-00256-LAK

## **CLASS ACTION**

LEAD PLAINTIFF'S MOTION TO CERTIFY CLASS, APPOINT CLASS REPRESENTATIVE AND APPOINT CLASS COUNSEL Case 1:12-cv-00256-LAK-AJP Document 122 Filed 03/15/17 Page 2 of 5

PLEASE TAKE NOTICE that, pursuant to the Court's Pretrial and Scheduling Order dated

February 1, 2017 (Dkt. No. 121), Lead Plaintiff Central States, Southeast and Southwest Areas

Pension Fund ("Central States" or "Lead Plaintiff") respectfully moves this Court to certify a class of

all persons who purchased or acquired MetLife, Inc. common stock in the Company's August 3,

2010 Offering or the Company's March 4, 2011 Offering. Excluded from the Class are defendants

and their families, the officers and directors of the Company, at all relevant times, members of their

immediate families and their legal representatives, heirs, successors or assigns and any entity in

which defendants have or had a controlling interest. Lead Plaintiff also moves this Court to appoint

Central States as Class Representative and, pursuant to Rule 23(g) of the Federal Rules of Civil

Procedure, to appoint Robbins Geller Rudman & Dowd LLP as Class Counsel. This Motion is based

on the accompanying memorandum of law, the Declaration of Shawn A. Williams and the

Declaration of James P. Condon in Support of Lead Plaintiff's Motion to Certify Class, Appoint

Class Representative and Appoint Class Counsel, filed herewith, the record in this case, and any

other pertinent matters the Court may consider.

DATED: March 15, 2017

ROBBINS GELLER RUDMAN & DOWD LLP SHAWN A. WILLIAMS AELISH M. BAIG ARMEN ZOHRABIAN DAVID W. HALL

s/ Shawn A. Williams

SHAWN A. WILLIAMS

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Lead Counsel for Plaintiff

## CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 15, 2017.

s/ Shawn A. Williams
SHAWN A. WILLIAMS

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## Mailing Information for a Case 1:12-cv-00256-LAK City of Westland Police and Fire Retirement System v. Metlife, Inc. et al

#### **Electronic Mail Notice List**

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The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Thomas

C. Michaud